

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**AFFIDAVIT OF JAMES D'ARECCA IN SUPPORT OF
ALLERGAN PLC'S MOTION TO DISMISS PURSUANT TO
RULE 12(B)(2) FOR LACK OF PERSONAL JURISDICTION**

STATE OF NEW JERSEY)
COUNTY OF MORRIS)

I, JAMES C. D'ARECCA, state:

1. I am the Senior Vice President and Chief Accounting Officer at Allergan plc.
2. Based on my position, experience, and review of relevant corporate records and information, I have personal knowledge of the facts set forth below, which I believe to be truthful and accurate, and to which I could and would competently testify if called as a witness.
3. Allergan plc's principal offices are located in Dublin, Ireland. It maintains administrative headquarters in Madison, New Jersey. The headquarters are leased from a third party by Allergan Sales, LLC.
4. Allergan plc's 2018 Form 10-K reports the existence of a manufacturing site in Cincinnati, Ohio. Allergan Sales, LLC—a subsidiary of Allergan plc—owns and operates this

facility. Allergan plc does not and has never owned or operated this facility. Allergan Sales, LLC's corporate records, tax returns, and financial statements are kept separate from Allergan plc.

5. Allergan plc's financial statements are reported to the SEC on a consolidated basis, reflecting revenue generated by the subsidiaries that it owns directly or indirectly.

6. In August 2016, Allergan divested its generics businesses to an affiliate of Teva in exchange for \$33.3 billion in cash. Allergan plc did not receive this cash because it did not directly own the equity in the businesses that were sold; rather, Allergan plc was the indirect parent of those businesses. Allergan plc's subsidiaries that actually owned the equity interests in those generics businesses received the cash and accounted for it in their general ledgers.

I declare under penalty of perjury under the laws of the United States and the laws of the State of Ohio that the foregoing is true and correct.

Executed this 25th day of July, 2019, at Madison, NJ.


JAMES C. D'ARECCA

Subscribed and sworn to before me, this 25th day of July, 2019


Notary Public

My commission expires on: **DANI T. WALKER**
A Notary Public of New Jersey
My Commission Expires September 20, 2020

[Notary Seal]